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 Zuffa, LLC and Dana White*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

MARK HUNT, an individual,)	Case No. 2:17-cv-00085-JAD-CWH
)	
Plaintiffs,)	
)	MOTION FOR LEAVE TO REDACT
vs.)	PORTION OF DEFENDANTS
)	ZUFFA LLC'S AND DANA WHITE'S
ZUFFA, LLC d/b/a ULTIMATE FIGHTING)	REPLY IN SUPPORT OF MOTION
CHAMPIONSHIP, a Nevada limited liability)	TO DISMISS PLAINTIFF'S
company; BROCK LESNAR, an individual;)	SUPPLEMENTAL COMPLAINT
and DANA WHITE, an individual; and DOES)	PURSUANT TO FED. R. CIV. P.
1-50, inclusive,)	12(b)(6)
)	
Defendants.)	
)	

Defendants Zuffa, LLC and Dana White, pursuant to Fed. R. Civ. P. 26(c), LR IA 10-5 and supporting case law, respectfully request that the Court permit them to redact a portion of their Reply in Support of Motion to Dismiss Plaintiff's Supplemental Complaint Pursuant to Fed. R. Civ. 12(b)(6) ("Reply").

BACKGROUND

Defendants seek to redact a portion of their Reply that quotes a section of the Promotional and Ancillary Rights Agreement dated April 12, 2016 between Zuffa and Plaintiff Mark Hunt ("2016 Promotional Agreement"). Hunt previously filed the 2016 Promotional Agreement in

1 this action as part of his Appendix to the Complaint. *See* ECF Nos. 1-7; 2. The 2016
2 Promotional Agreement contains a confidentiality provision. The Court previously granted
3 Hunt's motion to seal this document. *See* ECF No. 10. The Court has likewise granted
4 Defendants' motion to seal similar contracts between the parties. *See* ECF No. 86.

5 ARGUMENT

6 Documents filed in connection with a non-dispositive motion may be sealed if the party
7 seeking to seal the documents makes a "particularized showing" under the "good cause" standard
8 of Rule 26(c). *See Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir.
9 2006) (citations and internal quotation marks omitted); *see also Pintos v. Pacific Creditors*
10 *Ass'n*, 605 F.3d 665, 678 (9th Cir. 2010). The Court has "broad latitude" under Rule 26(c) "to
11 prevent disclosure of materials for many types of information, including, but not limited to, trade
12 secrets or other confidential research, development, or commercial information." *Phillips v.*
13 *General Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002) (citations omitted); *see also Selling*
14 *Source, LLC v. Red River Ventures, LLC*, 2011 WL 1630338, at *2 (D. Nev. April 29, 2011)
15 (finding good cause to seal information regarding finances, contractual agreements, and
16 information regarding particular arrangements with customers).

17 The 2016 Promotional Agreement between Zuffa and Hunt contains proprietary
18 information and has already been sealed by the Court. Zuffa does not seek to seal its entire
19 Reply. Instead, Zuffa seeks leave to redact a very limited portion of the Reply that quotes from
20 the sealed Promotional Agreement. The rest of the Reply will be available to the public.
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CONCLUSION

For the foregoing reasons, Defendants respectfully request that Zuffa be permitted to redact a portion of its Reply being filed concurrently herewith.

DATED this 20th day of April, 2018.

CAMPBELL & WILLIAMS

By /s/ J. Colby Williams
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **Motion for Leave to Redact Portion of Defendants Zuffa, LLC's and Dana White's Reply in Support of Motion to Dismiss Plaintiff's Supplemental Complaint Pursuant to Fed. R. Civ. P. 12(b)(6)** was served on the 20th day of April, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ J. Colby Williams
An employee of Campbell & Williams

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